

**BRAC IMPLEMENTATION COMMITTEE COMMENTS
ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
FOR THE BRAC ACTION AT THE NATIONAL NAVAL MEDICAL CENTER,
BETHESDA**

January 15, 2008

Note: This document is organized by the Resource Areas identified in Part 4 the Draft EIS. Each Resource Area is divided into three parts:

- 1. Consequences:** A summary of BRAC impacts described by the Navy in the Draft EIS.
- 2. Potential Improvement Measures:** A summary of potential improvements and mitigations to address BRAC impacts described by the Navy in the Draft EIS.
- 3. Committee Comments:** These are the Comments of the BRAC Committee relating to the Navy's description of BRAC impacts and potential improvements and mitigations in the Draft EIS.

4.0 GENERAL

COMMITTEE BASIC POINTS:

- 1. Data is either lacking, inconsistent, unsubstantiated or poorly explained throughout the Draft EIS and particular relating to:**
 - a. Parking analysis:** lack of data to support the number of spaces being provided.
 - b. Employment figures at NNMCMC:** conflicting information between the DEIS (8,000) and Navy web site (4,540).
 - c. Housing needs:** lack of data on anticipated outpatient/family housing needs
 - d. Patient and other trips to campus:** There is no detailed data on who the visitors are or when they would travel to and from campus. This lack of data makes it difficult to predict housing or lodging needs or proposed traffic mitigations, especially in the design and implementation of a Transportation Management Plan.
 - e. In many instances the Draft EIS relies on studies that have not been provided, which prevents sufficient evaluation of the Draft EIS. These studies should be made available in the Final EIS to make the Navy's analysis more transparent.**
 - f. Failure to consider impacts of major development projects in the region, especially in Bethesda.**
 - g. Some background data is old and may not be up to date.**
 - h. Current and projected traffic analyses lack a study of non-peak hour traffic.**

2. **DEIS downplays and understates impacts on off-campus neighborhoods:**
 - a. **Data lacking to support conclusion of negligible impacts in several resource areas, such as traffic, parking and air and noise pollution;**
 - b. **Stronger mitigation recommendations are needed where impacts may be greater than projected;**
3. **The Committee strongly disagrees with the DEIS dismissal of the applicability of Defense Access Road (DAR) grants. This BRAC action will occur in a confined, urban and well established community along major access roads that are already heavily congested. It will add significant unanticipated traffic to the region, exacerbating congestion in a dense urban environment. This situation will certainly challenge the integrity of NNMC's mission to establish a world class joint service military medical facility if doctors and patients are mired in gridlock and cannot gain timely access to urgent care. This situation will be more untenable considering the emergency medical and homeland security demands of NNMC, NIH and Suburban Hospital. DOD has a responsibility to deal with these off-campus issues. It is short-sighted to dismiss the applicability of DAR funding to help ensure the success of this high profile critical mission.**
4. **The Committee strongly disagrees with the DEIS dismissal of a proposed I-495 Beltway Slip Ramp directly to the NNMC campus. The DEIS does not recommend moving forward on this project. The Committee believes that a slip ramp directly to the NNMC campus warrants an immediate and thorough study because, if feasible, it would relieve significant levels of congestion from local roads and could serve as an evacuation route in an emergency. Rather than dismissing this project, SHA should conduct a study to determine its feasibility and should address current congestion on I-495 between I-270 and MD97.**
5. **The Committee believes that transportation studies must be considered comprehensively. The I-495 Beltway Slip Ramp study, including a study of traffic along the Beltway between I-270 and MD97, should be conducted in conjunction with the MD355 Corridor Study that is to be conducted. In addition, the area of the MD355 Corridor Study should be extended north to Montrose/Randolph Roads and south to MD410.**
6. **The Committee strongly supports the implementation of a robust transportation management plan (TMP) that discourages the use of single occupancy vehicles in the area of NNMC. The Draft EIS includes generic elements of a potential TMP but commits to nothing, waiting instead for a Master Plan. Since the elements of a Master Plan are already known, such as ongoing projects at USUHS and planned construction of day care centers, NEX expansion and Navy Lodge, the Final EIS should include a site-specific TMP. At the same time, the Committee understands the unique problems of attempting to reduce traffic at a military medical facility that operates around the clock and believes the Final EIS should more strongly**

address ways to reduce traffic in the region that is not generated by Defense activities.

- 7. The Committee is concerned that the Draft EIS dismisses potential traffic and pollution impacts on surrounding neighborhoods during the BRAC construction phase. Past experience with similar projects has demonstrated significant impacts to neighborhoods from construction-related parking, traffic congestion, demolition and transport of hazardous materials, and air and noise pollution.**
- 8. The Navy must establish an ongoing Office of Community Liaison, similar to that of the National Institutes of Health, to keep neighbors informed of campus activities, particularly during BRAC construction phase.**
- 9. Impacts must be mindful of non-BRAC related contingencies, especially impacts on emergency vehicles generally and those relating to the Bethesda Hospitals Emergency Preparedness Partnership (BHEPP) with NIH and Suburban Hospital.**
- 10. While traffic and environmental mitigation are the top priorities, construction should be mindful of green space and livable communities wherever possible.**

4.1 GEOLOGY, TOPOGRAPHY, AND SOILS

- **Consequences**
 - **Up to 13.3 acres of new construction – 8.5 acres on existing impermeable surfaces requiring demolition and 4.4 acres new construction on open space – with a net increase of up to 4.9% impermeable surfaces to existing 98 acres of impermeable surfaces.** A General Permit for Construction Activity would include an approved erosion and sediment control plan complying with Maryland’s environmental laws, to result in minor adverse impacts to soils on previously open areas and no new impacts on sites covered by existing manmade structures.
- **Potential Improvement Measures**
 - **Sediment and Erosion Control Measures:** Recommended measures to be considered include but are not limited to:
 - Using erosion containment controls such as silt fencing and sediment traps to contain sediment onsite where necessary;
 - Covering disturbed soil or soil stockpiles with plastic sheeting, jute matting, erosion netting, straw, or other suitable cover material;
 - Inspecting erosion and sediment control Best Management Practices (BMPs) on a regular basis and after each measurable rainfall to ensure that they are functioning properly, and maintain BMPs (repair, clean, etc.) as necessary to ensure that they continue to function properly;
 - Sequencing BMP installation and removal in relation to the scheduling of earth disturbance activities, prior to, during and after earth disturbance activities; and
 - Phasing clearing to coincide with construction at a given location to minimize the amount of area exposed to erosion at a given time.
- **COMMITTEE COMMENTS**
 - N/A

4.2 WATER RESOURCES

- **Consequences**
 - **Up to 4.8 acres of existing precious soil surfaces would be converted to impervious development.** Erosion and sediment control plans and a stormwater management plan would be required to reduce erosion of exposed soils, slow the rate at which water leaves the site, and capture eroded soils and concentrated nutrients before they enter the downstream water flow.
- **Potential Improvement Measures: Stormwater Management**
 - The following *nonstructural* stormwater management practices would be considered and applied according to the Maryland Stormwater Design Manual (MDE, 2000) to minimize increases in new development runoff:
 - 1) natural area conservation,
 - 2) disconnection of rooftop runoff,
 - 3) disconnection of non-rooftop runoff,
 - 4) sheet flow to buffers,
 - 5) grass channels, and
 - 6) environmentally sensitive development. Low Impact Development (LID) measures would be among those considered and implemented when practical.
 - The following *structural* stormwater management practices would be considered and designed according to the Design Manual (MDE, 2000) to satisfy the applicable minimum control requirements established in Section 4.1 of the Guidelines: stormwater management ponds, wetlands, infiltration, filtering systems, and open channel systems.
 - Areas disturbed outside of the footprints of the new construction would be aerated and reseeded, replanted, and/or re-sodded following construction activities, which would decrease the overall erosion potential of the site and improve soil productivity.
- **COMMITTEE COMMENTS**
 - New stormwater facilities need to address environmental concerns of increased mosquitoes and other disease carrying insects with the presence of infectious disease at NNMC and the extensive traveling of the residents surrounding NNMC.
 - What specific controls will be used to prevent and reduce erosion at the site both during construction and upon completion?

4.3 BIOLOGICAL RESOURCES

- **Consequences**
 - **All proposed construction would have adverse but not significant impacts to vegetation because projects are either on already developed land or in meadowlands with thinly scattered and common trees and shrubs. No effect on rare, threatened or endangered species.**
- **Potential Improvement Measures**
 - N/A
- **COMMITTEE COMMENTS**
 - Why doesn't the Forest Conservation Act apply to the NNMC BRAC action?
 - There is no indication of the number of trees and plant material to be removed and plans for replacement and/or reforestation.
 - Both Alternatives require the removal of many mature trees in the surface parking area to the north of the tower. What replacements and/or reforestation will take place to compensate for their removal?
 - As trees, bushes and plants help to maintain a healthier air quality, there must be impacts of the removal and failure to replace these forms of vegetation.

4.4 AIR QUALITY

- **Consequences**
 - Expected emissions should not exceed *de minimis* levels for moderate ozone nonattainment, particulate matter with less than or equal to 2.5 micrometers (PM_{2.5}) nonattainment, or CO maintenance levels.
- **Potential Improvement Measures**
 - The NNMC air permit requires all reasonable precautions be taken to prevent particulate matter emissions during construction or demolition. During construction and demolition, fugitive dust would be kept to a minimum by using control methods. These precautions could include, but are not limited to, the following:
 - 1) Use, where possible, of water or chemicals for dust control
 - 2) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials
 - 3) Covering of open equipment for conveying materials
 - 4) Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion
 - 5) Employment of a vehicle wash rack to wet loads and wash tires prior to leaving the site.
- **COMMITTEE COMMENTS:**
 - The Air Quality Analysis does not cite specific traffic studies that were used to reach conclusions. The Committee is concerned that standard formulas may not apply to the realities of this BRAC action. The Analysis may not take into consideration impacts of traffic during the construction phase and by the addition of approximately 2,500 employees and 484,000 annual visitors after construction is complete, and that levels of particulate matter and ground level ozone (smog) may be higher than estimated in the DEIS.
 - The Air Quality Analysis was taken over a one year period and does not address short term load effects during high impact construction phases. Spreading the data over a one year period lowers the impact during high construction periods and does not adequately analyze the environmental effects.
 - In terms of proposed air quality mitigations, what chemicals will be used for dust control and what is their environmental impact?
 - As trees, bushes and plants help to maintain a healthier air quality, there must be impacts on the campus and surrounding neighborhoods of the removal and failure to replace these forms of vegetation.
 - Are the cited *de minimis* standards of air pollution appropriate for this nonattainment area?

4.5 NOISE

- **Consequences**
 - **Short-term noise typical of demolition and construction activities will occur.** Most impacted areas would include Stone Ridge School and the residential neighborhood on the northern perimeter of NNMC.
 - **Increased vehicular and helicopter traffic noise is not expected to be significant.** One or two additional helicopter flights to NNMC per month are expected.
- **Potential Improvement Measures**
 - **Construction and demolition contractors would be expected to adhere to State of Maryland and Montgomery County requirements.** Potential measures to control airborne noise impacts that would be considered and implemented as appropriate include:
 - **Source Limits and Performance Standards to meet noise level thresholds for daytime, evening, and nighttime hours at sensitive land uses (Montgomery County Standards)**
 - Designated Truck Routes
 - Establishment of noise monitoring stations for measuring noise prior to and during construction
 - Design considerations and project layout approaches including measures such as construction of temporary noise barriers, placing construction equipment farther from noise-sensitive receptors, and constructing walled enclosures/sheds around especially noisy activities such as pavement breaking
 - Sequencing operations to combine especially noisy operations to occur in the same time period
 - Alternative construction methods, using special low noise emission level equipment, and selecting and specifying quieter demolition or deconstruction methods
 - **Control measures for sensitive receptors include:** sequencing operations, use of alternative construction equipment and methods and instituting other special control measures to reduce the transmission of high noise levels to noise-sensitive areas. A construction phasing plan would be coordinated with patient moves to avoid impacts to patients.
 - **Compliance with the Occupational Safety and Health Administration (OSHA) standards for occupational noise exposure associated with construction (29 CFR 1926.52) would address the construction workers hearing protection.**
- **COMMITTEE COMMENTS:**
 - What data was used to determine that “Residential areas on the east side of NNMC and across Jones Bridge Road are far enough from the construction sites that they are unlikely to be impacted by the noise from construction activities”?

- Have the number and location of noise monitoring stations been determined? Where will they be located?
- Noise analysis data has not been updated since 2003 and may be out of date.
- Has noise generated by construction truck traffic been analyzed? Has a construction truck route been selected and has noise along that route been projected?
- The Committee is concerned that the impacts on noise of increased helicopter traffic have not been sufficiently addressed. There is no credible analysis of the current or anticipated increased levels of helicopter traffic or their impact on traffic as well as noise in this congested urban environment.

4.6 UTILITY INFRASTRUCTURE

- **Consequences**

- **Initial estimates anticipate no major demands on utility infrastructure.**
Utility lines and pipes appear to have sufficient redundancy to provide continued service during construction and operation of the new facilities.

- **Potential Improvement Measures**

- N/A

- **COMMITTEE COMMENTS**

- The DEIS states that the present utility infrastructure will support either Alternative One or Two. The Committee believes the Final EIS should include confirmation of this statement from PEPCO, WSSC and Washington Gas that this statement can be supported.
- Will utility lines outside the fence adequately support lines inside the fence? If not, what will be the impacts of upgrading these lines, particularly if such upgrades would disrupt traffic along MD355 and other roadways?
- Would the use of an oil-fueled backup system in the event of a PEPCO failure have impacts on air quality? Have these impacts been assessed?
- The BHEPP collaboration depends on the integrity of local utilities. BRAC impacts and mitigations should account for the utility needs of NIH and Suburban Hospital.

4.7 TRANSPORTATION

- **Consequences**
 - **Additional 2200-2500 employees and 1862 projected daily patients and visitors to NNMC by 2011 will occur in and already congested urban environment.**
 - **BRAC-related traffic will exceed Critical Lane Volume (CLV) and cause unacceptable Level of Service (LOS F):**
 - MD355 @ North Wood Road: +7% AM peak traffic.
 - **AM peak traffic will exceed CLV even without BRAC:**
 - MD 355 @ West Cedar Lane: +3%.
 - MD355 @ Pooks Hill Road: +<=6%.
 - MD 355 @ Wilson Drive: +<=6%.
 - MD185 @ Jones Bridge Road: +<=6%.
 - **PM peak traffic will exceed CLV even without BRAC:**
 - MD355 @ West Cedar Lane: +2%.
 - MD187 @ West Cedar Lane: +12%.
 - MD355 @ Jones Bridge Road: +3%.
 - MD185 @ Jones Bridge Road: +4%.
 - **PM peak traffic will operate at a high but not excessive CLV:**
 - MD355 @ Pooks Hill Road: +2%.
 - MD355 @ North Wood Road: +14%.
 - MD355 @ Wilson Drive: +4%.
 - MD410 @ Jones Mill Road: +3%.
 - **AM peak traffic will increase but not at high or excessive CLV:**
 - Jones Bridge Road @ Gunnell Road: +35%.
 - MD355 @ North Wood Road: +21%.
 - **PM peak traffic will increase but not at high or excessive CLV:**
 - West Cedar Lane @ West Drive (NIH): +37%.
 - Jones Bridge Road @ Gunnell Road: +22%.
 - Jones Bridge Road @ Grier Road: +20%.
 - **Increase in patients and visitors will result in increased traffic during non-peak hours, although conditions will be within the capacity of the roadways.**
 - **Construction traffic: Delivery and dump-truck traffic during the construction phase will be significantly smaller than post-construction commuter traffic.** Construction-phase traffic generated by construction crews will require management. Peak traffic will increase significantly, but will not approach high or excessive CLV.
- **Potential Improvement Measures:** The EIS identifies potential traffic improvement measures for the 2011 implementation of the alternatives.
 - **The first set of potential improvements below is within the purview of NNMC for implementation. Gate and other improvements would be expected to**

speed vehicle entry and egress, improve Base circulation, and reduce queuing at the gate.

- ***North Wood Road Gate:***
 - 1) Expand the number of lanes from two lanes to three lanes, with two inbound lanes in the morning peak period and two outbound lanes in the evening peak period.
 - 2) Conduct a study at North Wood Road and Rockville Pike to determine if a traffic signal is warranted and suitable for submission of a request to state and local transportation authorities for funding and implementation.
 - 3) A safety and security analysis is being conducted by DOD to improve security, safety, improve queuing on-site and reduce Rockville Pike queuing, and reduce damage to gates and guard houses.
- ***South Wood Road Gate:*** A safety and security analysis is being conducted by DOD to improve security, safety, improve queuing onsite and reduce Rockville Pike queuing, and reduce damage to gates and guard houses.
- ***Gunnell Road Gate (Navy Exchange Gate):*** A safety and security analysis is being conducted by DOD to improve security, safety, allow egress of fire engines that cannot use this gate, and improve queuing.
- ***Grier Road Gate (Navy Lodge Gate):***
 - 1) It is recommended that this gate serve inbound and outbound traffic throughout the day.
 - 2) Provide for outbound right and left turn lanes. This approach would need to be widened to include a single receiving/inbound lane.
 - 3) A safety and security analysis is being conducted by DOD to improve security, safety, improve queuing on-site and reduce Jones Bridge Road queuing, and reduce damage to gates and guard houses.
- ***University Road Gate (USUHS Gate):*** A safety and security analysis is being conducted by DOD to improve security, safety, improve queuing on-site and reduce Jones Bridge Road queuing, and reduce damage to gates and guard houses.
- ***Perimeter Road:*** Widen and improve Perimeter Road on NNMCC.
- ***NIH Commercial Vehicle Inspection Station:*** Conduct a study at the NIH commercial Vehicle Inspection Station on Rockville Pike to determine if a traffic signal is warranted and suitable for submission of a request to state and local transportation authorities for funding and implementation.
- ***Robert Brown Road at North Palmer Road (discussed in Transportation Study, Appendix C):***
 - Widen the northbound approach of the intersection and provide a separate left-turn lane and a shared through/right turn lane. (Short Term)

- Widen the eastbound approach of the intersection and provide a separate right-turn lane and a shared through/left turn lane. (Short Term)
- **Each of the following projects is under the jurisdiction of either Montgomery County or the State of Maryland. As part of the BRAC law, the U.S. Navy cannot provide funding or management of road improvements outside its property, except under the Defense Access Roads (DAR) Program.**

The Defense Access Road (DAR) Program provides a means for the military to pay their fair share of the cost of public highway improvements necessary to mitigate an unusual impact of a defense activity. An unusual impact could be a significant increase in personnel at a military installation (currently defined as one that doubles existing traffic at the year of implementation), or one that requires relocation of an access gate, or the deployment of an oversized or overweight military vehicle or transporter unit. However, none of the off-base improvements meet the criteria for inclusion in the DAR Program.

As a consequence, each of the following projects would have to be funded and implemented through the appropriate Montgomery County or State of Maryland Transportation Organizations. This funding may include federal grants administered through these organizations. The Navy has coordinated the traffic analysis and potential improvements with these agencies. Note: it is anticipated that pedestrian walkways would be improved as needed to meet code for any roadways that are widened.

- ***Rockville Pike (MD 355) at Cedar Lane*** operates above capacity in both AM and PM peak hours:
 - 1) Add a left-turn lane on the westbound and eastbound approach of the intersection.
 - 2) Add an additional lane in each direction along Rockville Pike between Jones Bridge Road and Cedar Lane, per recommendation of the 1990 Bethesda Chevy Chase Master Plan. NNMCMC Bethesda will cooperate by providing frontage along MD 355 to accommodate the implementation of this measure if the State of Maryland and Montgomery County determine it appropriate to implement. Appropriate real estate easements would be coordinated and implemented to permit widening of Rockville Pike.
- ***Old Georgetown Road (MD 187) at Cedar Lane*** operates above capacity in the PM peak hour:
 - 1) Add another left-turn lane to the southbound approach of the intersection and eliminate parking along Cedar Lane eastbound to provide an additional receiving lane.

- 2) Provide an additional through lane in each direction along the Old Georgetown Road approaches to Cedar Lane, per recommendation of the 1990 Bethesda Chevy Chase Master Plan.
 - ***Rockville Pike (MD 355) at Jones Bridge Road*** operates above capacity in the PM peak hour.
 - 1) Stripe the inner lane as a left-turn only lane and the right lane as shared through and right lane on the eastbound approach of the intersection.
 - 2) Add an additional lane in each direction along Rockville Pike, per recommendation of the 1990 Bethesda Chevy Chase Master Plan. NNMC Bethesda will cooperate by providing frontage along MD 355 to accommodate the implementation of this measure if the State of Maryland and Montgomery County determine it appropriate to implement. Appropriate real estate easements would be coordinated and implemented to permit widening of Rockville Pike.
 - ***Connecticut Avenue (MD 185) at Jones Bridge Road*** operates near capacity in the AM peak hour and above capacity in the PM peak hour:
 - 1) Provide an additional left-turn lane to the eastbound approach of the intersection.
 - 2) Provide a separate right-turn lane along the southbound approach of the intersection.
 - ***Rockville Pike (MD 355) at North Wood Road (from Appendix C, Transportation Study)***: Conduct a full intersection study, including a traffic signal warrant analysis for this location, and implement identified geometric and/or signalization improvements. (Short Term)
- **Potential Long-Term Improvements:** These are potential measures for addressing existing and future regional transportation issues and should be studied and implemented by the appropriate public agencies if found warranted.
- **I-495 Beltway Slip Ramps into NNMC Campus: *No improvements recommended.*** It was anticipated that direct access via slip ramps between NNMC and the Beltway would divert significant traffic from major access roads onto the campus, and would thereby presumably have a positive effect on intersection performance. Full alternative scenarios were developed with alternative trip distribution and analysis, with 25 percent each of inbound and outbound trips using the ramps. Capacity analysis results for total future conditions show that, with and without slip ramps, the same intersections would operate near or above the County capacity standards.

In addition to having limited effectiveness at improving regional traffic, the limited distance between the adjacent interchanges creates safety concerns for merging traffic from a potential NNMC onramp. Federal Highway Administration policy would likely preclude the addition of an

intersection according to Title 23, Chapter 1, Sub-Chapter G Part 625. Creating only an off-ramp from the beltway to NNMC would create an unacceptable security concern as there would be no “turnaround” from a beltway gate. Considering the immense cost to state and federal transportation agencies, the limited effectiveness of direct ramps on local traffic congestion and several identified safety concerns, the Navy is not recommending the installation of Beltway Slip ramps to or from the NNMC campus.

- **Fringe Parking:** The M-NCPPC transportation staff has identified two parcels of land owned by the State which could be improved as fringe parking lots for use by NNMC employees. These parcels are located within the northeast quadrant of the I-495 at Connecticut Avenue Interchange. A preliminary study conducted by M-NCPPC staff indicates that the total capacity of the lots could be approximately 250 spaces. The fringe parking could reduce NNMC employee trips and related local area congestion impacts. It is noted that this potential fringe parking improvement was recommended by the Bethesda Chevy Chase Master Plan.
- **Pedestrian Improvements:** Provide sidewalks with five-feet minimum of pedestrian clear space along with a four feet minimum curbside buffer along both sides of all study area arterials (particularly along the east side of MD 355 adjacent to NNMC, Old Georgetown Road adjacent to NIH, and both sides Jones Bridge Road between Connecticut Avenue and Rockville Pike).
 - Provide ADA-compliant curb-ramps at all pedestrian crossings.
 - Provide high-visibility white in-lay tape “ladder” or “zebra” pattern crosswalks at all controlled and uncontrolled pedestrian crossings, (particularly along Rockville Pike and Old Georgetown Road in the vicinity of NIH and NNMC).
 - Provide pedestrian count-down signals at all controlled pedestrian crossings (particularly along Rockville Pike and Old Georgetown Road adjacent to NIH and NNMC).
- **Bicyclist Improvements:**
 - Eliminate gaps in the study area bicycle network, particularly along Old Georgetown Road adjacent to NIH as well as between the Georgetown Branch Trail and East-West Highway along Pearl Street.
 - Implement maintenance and geometric improvements to Rock Creek Park Trail north of East-West Highway.
 - Provide better lighting along many study area trails, particularly along Rock Creek and Georgetown Branch Trails.

- Provide a comprehensive system of bicycle wayfinding signage and maps throughout the study area, particularly along Woodmont Avenue in Downtown Bethesda.
- **Transit Improvements:**
 - Provide a pedestrian connection (in the form of a bridge or tunnel) between the Metro station and NNMC. This would significantly eliminate pedestrian exposure to unsafe crossing conditions along Rockville Pike in the vicinity of the NNMC South Gate/Metro station Area. This will create safe access to metro-rail and bus users of NNMC without having to cross the wide section of Rockville Pike.
 - Improve bus stop waiting experience with shelters and seating throughout the study area.
 - Provide more extensive bus route information, including route schedules, maps and real-time next bus information at all bus stops.
- **Potential Bethesda Chevy-Chase and Bethesda Downtown Master Plan Improvements:**
 - Provide an additional lane in each direction along Rockville Pike between Jones Bridge Road and Cedar Lane, in keeping with the Bethesda Chevy Chase Master Plan.
 - Provide an additional through lane in each direction along the Old Georgetown Road approaches to Cedar Lane, in keeping with the Bethesda Chevy Chase Master Plan.
- **Transportation Management Plan:** The National Capital Planning Commission (NCPC) established the requirement that federal agencies with master plan implementation projects resulting in increases of over 500 employees prepare and implement an effective Transportation Management Plan (TMP). The NNMC TMP will be updated as part of the ongoing Master Plan Update.
- **TMP Goals and Objectives:** The main goal of the NNMC TMP is to influence the travel choices of the users of the NNMC site towards reducing their potential adverse impacts on local area traffic congestion and air pollution. The main objective of the NNMC TMP is to reduce single occupant vehicle (SOV) trips to the NNMC campus, particularly during weekday morning and evening peak periods. This objective can be approached by setting goals and tracking progress on some of the means used to reach the objectives. These include:
 - Increase information availability and awareness among the NNMC users about various TMP strategies.
 - Increase average vehicle occupancy (AVO) by ride sharing programs.
 - Increase transit mode share from existing to greater.

- Reduce parking supply and demand ratio by employing parking management programs.
- Employ telecommuting/flextime programs to remove peak hour trips to NNMCM.
- **TMP Strategies:**
 - **Base Transportation Coordinator (BTC):** An NNMCM Transportation Services Coordinator (BTC) position could be established to coordinate and administer the transportation issues and TMP strategies at the NNMCM campus. The BTC would be responsible for conducting research on traffic patterns and emissions and the various modes used by staff, patients, contractors, and visitors and conducting surveys of personnel and patients. The BTC would have regular interaction with security and facilities on road and parking lot closings, problems, requirements, and related topics. This person would be responsible for interacting with applicable regulatory and transportation agencies and groups.
 - **Employee Transportation Services Coordinator (ETC):** An Employee Transportation Services Coordinator (ETC) position could be established to administer the TMP strategies for employees. The ETC would be responsible for developing and administering a promotional program for ridesharing and transit usage by employees, residents, and visitors.
 - **Ridematching (Carpool and Vanpool):** The ETC would be required to take an active role in promoting and facilitating carpooling and vanpooling strategies through the maintenance of an accurate database listing all of the participants, and arranging ridesharing matches. Finally, a pre-tax benefit could be offered for carpool and vanpool expenses (per Section 1 of Executive Order 13150).
 - **Parking Cash-Out Program:** Offering a parking cash-out program (assigning a value to each parking space and paying employees for not using one) would be a suitable alternative to reducing the number of parking spaces. This transit subsidy program for employees could also be implemented up to the maximum tax-free benefit allowable by law.
 - **Parking Management:** Priority parking spaces would be served for employees arriving by carpool or vanpool, or even those arriving during the less-congested times of the day. This parking could include assigned spaces near building entrances, level-one spaces in a structured facility or a priority position on a parking

space waiting list. Employees and visitors would also be required to pay for parking. In addition, a parking management company may be retained to manage the employee parking, provide valet parking and other related assistance. Disincentives to discourage violation of carpool preference regulations could be created.

- **Shared Parking with other Federal Agencies:** This program has the objective of adding park-and-ride facilities in the Beltway corridor along with other north-south and east-west corridors for use by NNMC and other Federal agency employees. NNMC would seek to "trade" on-campus employee parking spaces with other agencies located near the Beltway and a Metrorail station. Then, NNMC and other participating agencies would identify employees who will volunteer to park at the agency nearest their home, and take Metrorail or another mode of transit to their place of employment. Special shuttles could also connect park-and-ride lots in locations that do not have direct and/or easy transit access to the NNMC campus.
- **Reserved Parking at Existing and New Park-and-Ride Facilities:** M-NCPPC transportation staff has identified two parcels of land owned by the State which could be improved as fringe parking lots for use by area commuters. These parcels are located within the northeast quadrant of the I-495 at Connecticut Avenue Interchange. In addition a number of park-and-ride lots will be built along with the new planned BRT and LRT transit corridors extending along I-270, Georgia Avenue, and along east-west arterials - including the Bi-County Transitway and the Corridor Cities Transitway. NNMC would identify employees who will volunteer to park at these lots and then take transit to the NNMC Bethesda campus. Special shuttles could also connect park-and-ride lots in locations that do not have direct and/or easy transit access to the NNMC campus.
- **Guaranteed Ride Home:** This program, sponsored by the Metropolitan Washington Council of Governments, would be used to provide reliable and free emergency ride home from work for commuters who regularly carpool, vanpool, and bicycle, walk, or take transit to work.
- **Flextime/Compressed Work Week Programs:** The flextime program would allow employees to arrive and depart to and from work during the off-peak periods. The compressed workweek program would provide employees the opportunity to work the same number of hours in fewer days per week, or per pay period.

- **Telecommuting:** Some employees, whose jobs allow working remotely, could be given the opportunity to work from home one day or more days a week, maintaining contact with their office via fax machine, e-mail, and/or telephone.
- **Transit Amenities and Subsidies:** The NNMCC campus is situated adjacent to the WMATA Medical Center Metrorail Station. The campus also has very easy access to WMATA and Montgomery County Ride-On bus transit routes along Rockville Pike (MD 355) and Jones Bridge Road. Employees and residents of the campus could therefore be encouraged to use those transit facilities and services through the issuance of transit subsidies, Metrochecks, etc.
- **Work with State and County to Improve Pedestrian and Bike Access and Bus Conditions:** Improved pedestrian connections between the campus and the Medical Center Metrorail Station would make Metrorail and bus service more convenient to employees, residents, and visitors.

Over 53 percent of the employees surveyed live in Montgomery County. The Red Line provides service to Medical Center Metrorail station; Montgomery county riders will need to get to a Metrorail station. As an example, a rider traveling from the Twinbrook Station in Montgomery County would take only 7 minutes by transit to reach Medical Center Metro Station, while driving from the station would take approximately ½ hour. Therefore, Metrorail can provide a realistic way to make transit as a primary mode of transportation. Similar changes can or should be incorporated into the Purple Line if approved. Improvements to Bus Stops such as providing shelters on- base and off-base are ways to make commutes more enjoyable. Working with the counties in the area to identify potentially more useful routes or route changes can improve service to the employees and reduce commute times.

- **Shuttle Bus Services:** NNMCC currently provides shuttle bus service to its users. This service would be coordinated with those of adjacent medical institutions, particularly NIH, which currently operates such a service with stops at the Medical Center Metrorail Station portal and on- and off-campus locations (source: 2001 NIH Master Plan). Quick and frequent shuttle connections to Downtown Bethesda, where extensive dining, retail, services, and other amenities are located, would help discourage single occupant driving. One option would be to extend the route of the existing free Bethesda Circulator to the Medical Center Metrorail Station.

The Bethesda Circulator provides frequent all-day weekday and Saturday evening/night service to all key points in Downtown Bethesda. Finally, 10-minute peak period shuttle headways in addition to transit stop amenities including real-time shuttle bus arrival information, posted transit route maps and schedules, and shelter and seating on all area shuttle routes would enhance the user experience and make the shuttle system more attractive to non-users.

- **Future Parking Provision:** Under BRAC, some of the existing parking lots will be demolished either completely or partially. These demolished lots, as all well as parking potentially being demolished near new buildings, would lead to a loss of approximately 700 parking spaces. The BRAC action will add a total of approximately 2,500 spaces in the three parking garages under the alternatives, resulting in a net addition of approximately 1,800 parking spaces when parking spaces lost are considered. Slightly more than 50 percent of the new parking would be for use by patients and visitors. As the operation of the medical care facility is 24 hours per day, with changing shifts, and with the nearby mass transit, it can be concluded that sufficient parking will be available within the NNMC campus to accommodate the alternatives.
- **To improve pedestrian safety at the Rockville Pike pedestrian crossing from NIH and the metro station to NNMC, a pedestrian connection and a Metrorail link are under consideration by the Suburban Hospital, NIH, NNMC Consortium and WMATA, respectively.** In addition, the pedestrian connection would allow transfer of casualties and emergency personnel during a mass casualty event. These off-base projects would require easements and changes to fencing and security. They would require close cooperation with local and state agencies as well as with NIH and the Department of Homeland Security (DHS).
- **Planned and Programmed Improvements --** The Background traffic conditions include consideration of planned and programmed improvements which would influence traffic conditions if or when implemented.
 - **Planned Improvements --** The following roadway improvements are recommended by Bethesda Chevy Chase (BCC) Master Plan (April 1990):
 - **Cedar Lane at Rockville Pike:**
 - Add a right turn lane to eastbound Cedar Lane
 - Add a through lane to westbound Cedar Lane
 - Add a right turn lane to northbound Rockville Pike
 - Add north-south through lanes on Rockville Pike
 - **Jones Bridge Road at Wisconsin Avenue:** Add a left turn lane to westbound Jones Bridge Road and to southbound Rockville Pike.

- **Rockville Pike would be widened to eight lanes between Cedar Lane and Jones Bridge Road after 2010.**
- **An interchange at Rockville Pike and Cedar Lane** would be retained as a possible project after year 2010.
- **The Bethesda CBD Master Plan (July 1994) recommends implementing a peak period reversible lane on Old Georgetown Road from Woodmont Avenue northward to Huntington Parkway,** and subsequently extend it from Huntington Parkway to north of West Cedar Lane when future traffic conditions warrant this improvement.
- **The Bethesda CBD Master Plan also recommends converting Wisconsin (northbound) and Woodmont (southbound) Avenues into a one way pair through the CBD,** if warranted by future traffic conditions.
- **Increase the level of feeder bus services, particularly in the eastern half of planning area.**
- **Provide park and ride lots for 750 vehicles at locations that would intercept vehicles destined to employment centers such as Bethesda CBD, NIH and the National Naval Medical Center.** Recommended potential locations include I-495 at Kensington Parkway (250 spaces), and River Road, from west of the Cabin John Fire Station No.10 to the west of Seven Locks Road (500 spaces).
- **Programmed Improvements --** Following is a list of projects in planning/engineering or construction phases from the Maryland Consolidated Transportation Program (2007- 2012) that could influence NNMC transportation conditions in the long term:
 - **Intersection Capacity Improvement and Roadway Rehabilitation:**
 - Rockville Pike at Jones Bridge Road: widening to extend right turn lanes (Funded for preliminary engineering only).
 - Rockville Pike: northbound Bridge 15119 over I-495 outer loop -- bridge deck replacement. (Funded for Construction)
 - Capital Beltway at MD 355; geometric improvements. (Funded for Construction)
 - **Corridor and Transitway Projects:**
 - **The Capital Beltway Study is in its planning phase and to date has determined the need to widen this facility to 10 lanes through Montgomery and Prince George's**

Counties, with two lanes devoted to HOV and express bus service.

- **The InterCounty Connector** is a new East-West multi-modal highway in Montgomery and Prince George's Counties between I-270 and I-95/ US 1. This is a BRAC related project which will be under construction during this fiscal year 2007. This project is needed to improve access between economic growth centers and to advance homeland security measures.
- **The Bi-County Transitway (Purple Line) Study** is evaluating the feasibility of constructing a 14-mile transitway that would connect Silver Spring and Bethesda with a light rail line following an abandoned railroad right of way for most of its length. The constrained Long Range Plan calls for its implementation by 2012.
- **The I-270 Corridor Cities Transitway (CCT) Study** has been funded for planning and engineering with respect to widening of US 15 to six lanes and I-270 (to progressively match the existing 12-lane I-270 at Shady Grove Road) between MD Route 26 in Frederick and Shady Grove Road near Gaithersburg. The CCT would be either a light rail transit (LRT) or bus rapid transit (BRT) line. HOV and Transportation Demand Management measures such as park and ride lots and bus transit will be included throughout.
- **Pedestrian and Bicycle Facilities:** Rock Creek Hiker-Biker Trail Bridge: construction of a 1,060 linear feet long by 8 feet wide trail with 610 feet long by 12 feet wide pedestrian bridge over Veirs Mill Road.

- **COMMITTEE COMMENTS**

- **General Transportation Comments**

- The Committee is very concerned that NNMC traffic estimates are substantially lower than those derived from an MNCPPC study for the one-to-five years prior to the NNMC study. NNMC should acknowledge in the Final EIS that further studies may reveal that more extensive mitigations may be required than are identified in the Draft EIS.
 - The Committee is very concerned that the Draft EIS dismisses the impact of increased traffic on intersections that are already or close to failing. To understate the significance of adding more traffic to intersections that are

already failing short-sighted and not helpful. Considering the nature of the project – to develop a world class medical center to treat America’s active, retired and wounded military personnel – the Defense Department has a responsibility to ensure the flow of traffic, especially emergency vehicles, in and around the facility. The Final EIS must reconsider the impacts of this BRAC action on roads and intersections that are already or close to failing, must propose mitigations and assume DOD responsibility to ensure accessibility of NNMC to patients and doctors post-construction.

- The Committee is very concerned that the traffic impacts during the construction phase have not been analyzed, and that the Draft EIS includes flawed assumptions that have no basis in fact. For example, the Draft EIS offers no assurance of specific plans or programs to prevent construction-related parking and congestion in nearby neighborhoods. The Committee believes NNMC should provide a plan for the construction phase, particularly if Congress accelerates it by one year.
- The Committee is very concerned that the lack of reliable data about the nature of visits to the campus will make it difficult to develop viable mitigations. Although the trip generation breakdown may be technically adequate to examine intersection capacity, it is nowhere near detailed enough to relate auto usage to specific functions and facilities on site. It is, therefore, impossible to judge the adequacy or proper distribution of the parking onsite or develop an efficient transportation demand management program. For example, what exactly constitutes a visit, and how many cars does NNMC expect to come to the campus each day, and during what hours? Formulaic calculations do not reflect the reality of daily activities at the campus.
- Similarly, the Committee is very concerned that the Draft EIS dismisses the applicability of Defense Access Road (DAR) grants in this project. Defense Department standards applying DAR grants only where defense actions double the amount of traffic on base-serving arteries is short-sighted and unrealistic in a heavily urban environment.
- Transportation statistics are inconsistent in many places throughout the Draft EIS. For example, the projected trip distribution pattern at the 5 NNMC access points (Figure 17, page 53, Transportation Study, Appendix C) is not consistent with the DEIS traffic counts on which it is based. In addition, the DEIS based BRAC traffic and travel patterns on current NNMC data even though existing residential data for Walter Reed employees (who are expected to maintain their current residential locations and commute to NNMC) clearly indicate that their traffic and travel patterns will differ from those of current NNMC employees.

- Traffic counts underestimate the potential CLV at certain intersections because they do not account for cut-through traffic (often illegal) on neighborhood roads to avoid those intersections. For example, neighborhoods at the MD355 intersections with Cedar Lane and Jones Bridge Road experience significant cut-through traffic.
 - The Committee believes the traffic study area was too limited. Studies should be conducted on roadways and intersections extending along MD187, MD355 and MD185 north to Montrose/Randolph Roads and south to MD410. Studies should include arterial and secondary roads in these corridors.
 - The Committee is concerned that the Draft EIS does not account for several large development projects along the greater MD355 corridor and throughout the region that will impact traffic in the area of NNMC.
 - The Committee urges NNMC to establish an Office of Community Relations, similar to that at the National Institutes of Health, to meet regularly with neighborhood residents, business owners and local officials and provide an ongoing flow of information during and after the construction process.
- **On-Campus Improvements**
 - The Draft EIS lacks a traffic analysis of the impacts of new NNMC security gates along Jones Bridge Road. These gates will likely cause new traffic backups that will require mitigation. One suggestion is to study the feasibility of constructing an access road on NNMC property parallel to the north side of Jones Bridge Road that would be used to provide car and truck access to any of the Jones Bridge Road gates.
 - Kiss-and-ride and patient drop-off access should be provided to encourage vanpooling and carpooling.
 - A weather protected walkway or tunnel – preferably a moving walkway – should be constructed from Kiss-and Ride lots and an anticipated east-side Metro entrance, to enhance pedestrian accessibility and use of transit and carpooling.
 - **State and/or County Jurisdiction (short term)**
 - *Rockville Pike (MD 355) at Cedar Lane*
 - *Old Georgetown Road (MD 187) at Cedar Lane*
 - *Rockville Pike (MD 355) at Jones Bridge Road*
 - *Connecticut Avenue (MD 185) at Jones Bridge Road*
 - *Rockville Pike (MD 355) at North Wood Road*

- **The federal government should assume responsibility to fund mitigations of the traffic impacts this critical BRAC mission will have in a dense urban setting.**

The Draft EIS should not dismiss Defense Access Road (DAR) grants as a source of funding for these essential improvements. The Draft EIS bases a shift of responsibility to road improvements to local and state governments on an inappropriate standard. That is, it states that the Navy is not permitted to provide funding or management of road improvements outside its proper except under the Defense Access Roads (DAR) Program, which only allows the federal government to pay its "fair share" when there is an "unusual impact." (DEIS at pages 4-49-4-50, section 4.7.3.2).

However, the definition used therein for "unusual impact" is doubling existing traffic impact. This is an inappropriate standard given the well acknowledged unique aspect of this BRAC action being the only such action taken in a high-density urban setting. It is easily imagined that under more traditional BRACs, such as an expanded military installation in a rural setting, that the standard requiring a doubling of traffic would be more common and appropriate. In such actions, doubling traffic on rural roads where little exists prior to the BRAC, the "unusual impact" definition of twice existing traffic makes sense. Here, it would be nearly impossible to double traffic in an area in which several of the key intersections are already failing.

DOD must exercise wise judgment in this instance and consider waiving or revising its standards for DAR grants in this urban BRAC, and must assume a more active role in funding and assisting in road improvements surrounding the NNMC. It should be the Navy's goal, as well as common sense, that there should be no failed intersections in the area surrounding its flagship medical center after this BRAC action is concluded, not simply returning the intersection to a pre-BRAC level of failure.

- The Committee urges the County or NNMC to utilize police presence to enforce traffic laws and help facilitate the movement of traffic through intersections and along nearby roadways.
- New and Improved sidewalks around the NNMC perimeter would encourage pedestrian access and promote safety.
- The Committee appreciates the Navy's willingness to transfer frontage along MD355 to allow for important traffic mitigation projects, such as construction of an east side entrance to the Medical Center Metro station, adding turn lanes, and potential widening of MD355. The Committee believes transfer of frontage along Jones Bridge Road would also be

appropriate to improve access to NNMC gates, facilitate the flow of traffic, and mitigate congestion at two key intersections with MD355 and MD185. Some Committee members are concerned that widening MD355 would be detrimental to pedestrian safety and the preservation of green space and support the use of reversible lanes as an alternative to widening.

○ **Potential Long-Term Improvements**

- **Beltway Slip Ramp:** The Committee strongly disagrees with the DEIS dismissal of a proposed I-495 Beltway Slip Ramp directly to the NNMC campus. The DEIS does not recommend moving forward on this project. The Committee believes that a slip ramp directly to the NNMC campus warrants an immediate and thorough study because, if feasible, it would relieve significant levels of congestion from local roads. Rather than dismissing this project, SHA should conduct a study to determine its feasibility and should address current congestion on I-495 between I-270 and MD97. .
- **Fringe Parking:** Proposals for shuttle lots at I-495 @ MD185 only encourage traffic to use the Beltway, which is already over utilized. The Committee urges NNMC and the County to study constructing shuttle lots much farther out, which would be more likely to attract commuters and remove cars from already congested urban areas.
- **Pedestrian Improvements.** The Committee supports sidewalk construction and rehabilitation in the area.
- **Bicycle Improvements.** Improvements to the trail surface of the Capital Crescent Trail between Bethesda and Silver Spring are necessary, as well as to the Rock Creek Park Trail. Some Committee members note that the Draft EIS recommendation to improve lighting along the Rock Creek and other bicycle trails is unnecessary because the trails currently are closed after dark.
 - The Final EIS should recommend full implementation of Montgomery County's Countywide Bikeways Functional Master Plan in recognition that bicycle commuting is feasible only where there is an unbroken, interconnected system of bikeways. The Master plan focuses on ensuring bikeway connections to the County's major activity centers: municipalities, central business districts, town centers, transit stations, major employment hubs, countywide park trails and regional parks.
 - For similar reasons, all roads in the vicinity of NNMC should have wide outside lanes and/or rideable shoulders where there is no adjacent bike path.
- **Transit Improvements**
 - An entrance to the Medical Center Metro station from the east side of MD355 is essential. This would also serve as a pedestrian tunnel beneath MD355 to enhance pedestrian safety.

- Have transit ridership studies been done for WRAMC and NNMC employees relative to the Purple Line, CCT, or potential use of shuttle buses?
 - **BCC, Downtown Bethesda Master Plan Improvements.** Elements of the Master Plans should gain a high priority with BRAC. Reversible lanes along MD187 and MD355 north of the Bethesda CBD are feasible projects. In addition, road signage along all major arteries must be improved to direct traffic to NNMC
- **Transportation Management Plan (TMP)**
 - The Committee strongly supports the implementation of a robust TMP that discourages the use of single occupancy vehicles in the area of NNMC. The Draft EIS includes elements of a potential TMP but commits to nothing, waiting instead for a Master Plan. Since the elements of a Master Plan are already known, such as ongoing projects at USUHS and planned construction of day care centers, NEX and Navy Lodge, the Final EIS should include a site-specific TMP
- **Future Parking Provisions.** The Committee believes there is no data to support the net increase of almost 1,900 parking spaces on the Campus. How was this figure derived?
- **Pedestrian Safety and Access and/or Metro Entrance:** The Committee strongly supports construction of a Medical Center Metro entrance on the east side of MD355. In addition, the Committee supports constructing weather protected walkway or tunnel – preferably a moving walkway – from Kiss-and Ride lots and this Metro entrance, to enhance pedestrian accessibility and use of transit and carpooling.
- **Planned and Programmed Improvements**
 - **Planned Improvements**
 - *Cedar Lane at Rockville Pike.*
 - *Jones Bridge Road at Wisconsin Avenue*
 - *Rockville Pike would be widened to eight lanes between Cedar Lane and Jones Bridge Road after 2010.*
 - *An interchange at Rockville Pike and Cedar Lane.*
 - *The Bethesda CBD Master Plan (July 1994) recommends implementing a peak period reversible lane on Old Georgetown Road from Woodmont Avenue northward to Huntington Parkway.*
 - *The Bethesda CBD Master Plan also recommends converting Wisconsin (northbound) and Woodmont (southbound) Avenues into a one way pair through the CBD.*

- *Increase the level of feeder bus services, particularly in the eastern half of planning area.*
 - *Provide park and ride lots for 750 vehicles at locations that would intercept vehicles destined to employment centers such as Bethesda CBD, NIH and the National Naval Medical Center.*
- The Committee notes an error in Appendix C, Transportation Study. Page 9 Diagram # 5 is incorrect. Of the three Cedar Lane westbound lanes at MD355, the middle lane is a left turn lane in addition to being a through lane.
- The Committee supports the use of reversible lanes outlined in the Master Plans, and also supports studying the feasibility of reversible lanes along MD 355 between I-495 and the CBD.
- The Committee strongly supports an expanded Ride-On and shuttle bus program
- The Committee believes that park-and-ride lots close to NNMC would do little to relieve traffic from major arteries in the area. These lots should be located much farther out, to remove single occupancy vehicles from roadways and encourage the use of commuter buses, carpools and vanpools.
- **Programmed Improvements:**
 - **Intersection Capacity Improvement and Roadway Rehabilitation:**
 - **Rockville Pike at Jones Bridge Road.**
 - **Rockville Pike: northbound Bridge 15119 over I-495 outer loop -- bridge deck replacement.** This project is under way and will be completed in the near future.
 - **Corridor and Transitway Projects:**
 - **The Capital Beltway Study is in its planning phase and to date has determined the need to widen this facility to 10 lanes through Montgomery and Prince George's Counties.** Some members of the Committee believe this plan is not likely to be realized in the foreseeable future and should not be considered a potential mitigation for this BRAC action.
 - **The InterCounty Connector.** The Committee notes that this project has been planned for decades and should not be considered as a BRAC mitigation at the expense of other projects that must be implemented.
 - **The Bi-County Transitway (Purple Line).** While there is no consensus on the Committee for a specific mode or

route of this project, the Committee believes that transit access to NNMC must be increased. Some Committee members support the Purple Line Master Plan, others support the Bus Rapid Transit alignment along Jones Bridge Road, while others believe the “Loop” proposal deserves further study. It would be helpful if MTA conducted a ridership survey of WRAMC and NNMC employees. Constructing the Purple Line would also make even more essential the construction of an east-side Medical Center Metro entrance.

- **The I-270 Corridor Cities Transitway (CCT).** It would be helpful if MTA conducted a ridership survey of WRAMC and NNMC employees. Constructing the CCT would also make even more essential the construction of an east-side Medical Center Metro entrance.
- **Pedestrian and Bicycle Facilities.**
 - The Committee supports measures that promote the use and enhance the safety of pedestrian and bicycle paths. Sidewalk upgrades and completion of the area hiker/biker network are critical. Providing for safe pedestrian access to and from the Medical Center Metro station from both sides of MD355 is critical and would be addressed by constructing an east-side station entrance that could also serve as a pedestrian tunnel.

4.8 CULTURAL RESOURCES

- **Consequences**
 - **New construction could have adverse effect on the “protected view shed,” although there is ample precedent for build-outs from the historic Tower block.**
- **Potential Improvement Measures**
 - **Due to the potential impacts on the historic and cultural resources around Building 1, the historic tower, the Navy has developed a concept plan of the proposed inpatient and outpatient facilities as well as the two proposed parking structures.** These concept plans were coordinated with Maryland-National Capital Parks and Planning Commission (M-NCPPC) and Maryland State Historic Preservation Office.
- **COMMITTEE COMMENTS:**
 - NNMC must commit to achieving Leadership in Energy and Environmental Design (LEED) standards in the construction of the new facilities.

4.9 LAND USE AND ZONING

- **Consequences**
 - **No direct impacts or significant indirect impacts to land use zooming outside the NNMC Campus boundaries.**
- **Potential Improvement Measures**
 - N/A
- **COMMITTEE COMMENTS**
 - The Draft EIS shows no basis in fact for the conclusion that BRAC will yield no direct impacts or significant indirect impacts to land use, zoning, or relocation of WRAMC employees.
 - Does NNMC have plans to schedule patient and family visits so they do not contribute to traffic during peak hours?
 - The Committee is very concerned that the important land use issues related to housing for increased military personnel, outpatients and families are not adequately addressed in the Draft EIS. Lack of sufficient on-campus housing will have impacts on traffic. The scarcity of affordable housing in Montgomery County could force NNMC personnel and outpatient families to live remotely and create more traffic on roads throughout the region.
 - Is there an analysis of how many of the patients (including all in-patients, out-patients, TBI and PTSD) are expected to have family members relocate to this area during the time of convalescence?
 - Of these relocated families, how many can be accommodated on base?
 - What is the average length of stay for a relocated family?
 - Square footage statistics for Fisher Houses and BEQ housing do not translate into the number of people these facilities would serve. Is there a factual basis that construction of two new Fisher Houses will meet this demand?
 - What is the impact on the nearby and surrounding community as these families attempt to find suitable housing and cannot find on-base housing?
 - Is there a factual basis that new BEQ facilities will meet military personnel housing needs?
 - If on-campus housing for military personnel is insufficient, will NNMC institute incentives for personnel to live near Metro stations or close to the campus?

4.10 SOCIOECONOMICS

- **Consequences**
 - **Major beneficial economic impacts resulting from construction and renovation at NNMC.**
 - Construction costs estimated at approx. \$856 million.
 - Prospective increase in sales volume in the 6-mile Region of Influence (ROI) estimated at \$1.34 billion, 39% of which resulting directly from BRAC construction.
 - Prospective increase of employment in ROI would be approx. 5,600, 39% of which resulting directly from BRAC construction.
 - **No significant effect on demographics, because no significant relocation of off-base personnel is expected since staff would be coming from WRAMC, which is located just six miles away.**
 - **Little direct impact on local economy from increase in patients and visitors.** More patients and visitors will increase the need for services within NNMC, but the patients and visitors are likely to go to appointments directly from places of residence.
 - **BRAC action not expected to produce disproportionately high and adverse human health or environmental effects on minority, low-income or younger segments of the local population.**
- **Potential Improvement Measures**
 - N/A
- **COMMITTEE COMMENTS**
 - The Draft EIS failure to address on-campus patient and visitor housing has important socioeconomic consequences. Square footage statistics for Fisher Houses and BEQ housing do not translate into the number of people these facilities would serve. Reasonably priced accommodations will likely being located at a distance from NNMC, forcing families to reside far from NNMC, creating other financial and transportation hardships for them and further contributing to regional traffic congestion.
 - The Committee would like to see more information, if available, about the economic impact of BRAC-related employment, especially during construction, on the Maryland and Montgomery County economies, not just on the wider Region of Influence.
 - The Committee believes the EIS should address the socioeconomic impact of this BRAC action on the Bethesda Central Business District and the other institutions of the BHEPP – NIH and Suburban Hospital.

- The Committee believes the Final EIS should evaluate the impacts of this BRAC action on the economic viability of current and future developments in the Bethesda Central Business District. The Committee is concerned that increased traffic and congestion resulting from this BRAC would discourage people from coming to the CBD and have negative commercial impacts.

4.11 HUMAN HEALTH AND SAFETY

- **Consequences**
 - **Hazardous material and storage use would have a minimal increase and are not anticipated to have significant impacts under the NNMC Hazardous Material Program.**
 - **Hazardous waste would increase but is not anticipated to have significant impacts because NNMC is regulated under federal and state environmental and conservation laws; NNMC also operates under Navy and NNMC hazardous waste policies.**
 - **No unacceptable human exposure to contamination that can be reasonably expected under current land and groundwater use conditions.**
 - **Known asbestos and lead-based paint in older buildings to be demolished or renovated. Proper procedures will be used to ensure public safety.**
- **Potential Improvement Measures**
 - By following NNMC standard operating procedures and applicable regulations, no impacts are expected and no additional mitigation measures or improvement measures are required for human health and safety.
- **COMMITTEE COMMENTS**
 - The Committee is very concerned about the implications of this BRAC action on the viability of the Bethesda Hospitals Emergency Preparedness Partnership (BHEPP), collaboration between NNMC, NIH and Suburban Hospital in times of crisis in the National Capital Region. What measures will NNMC use to ensure the viability of the BHEPP in the face of increased vehicular and pedestrian traffic?
 - Increased traffic will have safety impacts generally. What measures will NNMC use to ensure pedestrian and drive safety in off-campus neighborhoods impacted by increased traffic?
 - What safety assurances will be in place with the increase in Regulated Medical Waste (RMW), asbestos and other substances being shipped off-base? Have related increases in truck traffic and noise been included in the relevant studies?
 - Given the increased levels of traffic that are anticipated, what provisions are being made to ensure the safe and unhindered travel of emergency vehicles in the area?

4.12 CUMULATIVE IMPACTS

- **Consequences**
 - **Ongoing project at USUHS School of Nursing; anticipated non-BRAC projects: expansion to Navy Lodge, expansion to Navy Exchange (NEX), additional Non-Commissioned Officers Quarters, two day care centers, improvements to recreational facilities, improvements to all access gates, Grier Road Commercial Vehicle Inspection Facility, planned Metrorail link in southwest corner of campus near MD355, and pedestrian connection to NIH.** Only three projects (NEX, Navy Lodge and day care centers) will add estimated 136 total staff. NEX would add visitors, but generally only during non-peak hours.
 - **Implementation of 2003 NIH Master Plan and a transportation analysis of MD3455 Corridor will take place during NNMCC BRAC action.** BRAC action not expected to add significant incremental impacts to these projects.
- **Potential Improvement Measures**
 - N/A
- **COMMITTEE COMMENTS:**
 - As stated on page 4-73, the DEIS considered both NIH and BCC master plans and concluded that commuter traffic will not increase as a result of the NIH Master Plan. However, the DEIS does not take into account the new NIH visitor center that will be coming on line in the second quarter of 2008 which will add vehicles to north bound Route 355 via Battery Lane throughout the day.
 - While the Navy received background development information from the county, it is not inclusive of all the development planned in the nearby area. It is not clear that the DEIS has taken into consideration the combined impact of many new apartment buildings that are in the early construction phases along Wisconsin Avenue south of Jones Bridge Road and north to Montrose/Randolph Roads.
 - The DEIS needs to be more forthright on the cumulative impact that the traffic will have both during and beyond peak hours. The Navy acknowledges that “incremental effect could add to a general level of traffic that would be noticeable and inconvenience other motorists” p. 4-78. However, DEIS understates the extent of the problem. Using its own survey data, base-related traffic will increase by 25% the number of failing intersections in the PM commute. A more realistic estimate, based on 2006 County data, would suggest that the number of failing intersections around NNMCC resulting from base expansion will more than double.
 - There is no data about the traffic impacts of increased visits to the day care centers, Navy Lodge, or expanded NEX.

4.13 APPENDIX A - PUBLIC CORRESPONDENCE

- **COMMITTEE COMMENTS:**

- Correspondence and Public Involvement, Attachment 5: List of Community Associations that was mailed the Notification of the Public Scoping Meetings – this list does not include at least two nearby citizens associations that, in fact, were not officially notified of the scoping meetings.